

# EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

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IN RE: DEALER MANAGEMENT SYSTEMS  
ANTITRUST LITIGATION

MDL No. 2817  
Case No. 18 C 864

This Document Relates to All  
Cases

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**DECLARATION OF ANDREW WEILL IN SUPPORT OF THE  
MOTION FOR APPOINTMENT OF THE MILBERG TADLER GROUP TO LEAD  
THE DEALERSHIP CLASS ACTION**

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Andrew Weill, an attorney admitted to practice in the courts of the State of California, declares pursuant to 28 U.S.C. § 1746:

1. I am President of the National Association of Dealer Counsel ("NADC"). The NADC is a nationwide professional organization, formed in 2004, of attorneys who represent automobile and other vehicle dealers.
2. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.
3. I submit this declaration in support of the Motion For Appointment of the Milberg Tadler Group To Lead The Dealership Class Action.
4. The NADC provides a forum for members to share information, common experience and advice related to manufacturer franchise issues, dealer management software systems, lemon laws, vehicle finance, regulatory complexities, insurance laws, tax laws, buy/sell agreements, employments, employment law, and many other issues facing dealers and their counsel today. The NADC currently has approximately six hundred (600) attorney members from across the country.
5. NADC membership is vitally important for any lawyer who regularly practices in the

area of automotive franchise law. We provide our lawyer members with educational seminars, semi-annual conferences to share information and discuss best practices, and an email based "List Serve" that serves to provide a forum for the daily exchange of news, questions, ideas, as well as legal and operational developments.

6. I have known Len Bellavia, Esq. and his firm for over ten (10) years. Mr. Bellavia was a founding member of the Board of Directors of the NADC and had previously served as the NADC's Chair of its Litigation Section for 9 years. Mr. Bellavia has also been a regular presenter at NADC conferences since its inception. Bellavia Blatt is also well known for having handled some of the most noteworthy litigation on behalf of franchised automobile dealers.

I declare under penalties of perjury, under the laws of the United States, that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 23 day of March, 2018.



Andrew Weill